

AARON D. FORD  
Attorney General  
Steve Shevorski (Bar No. 8256)  
Chief Litigation Counsel  
Akke Levin (Bar No. 9102)  
Senior Deputy Attorney General  
Office of the Attorney General  
555 E. Washington Ave, Ste. 3900  
Las Vegas, NV 89101  
(702) 486-3420 (phone)  
(702) 486-3773 (fax)  
sshevorski@ag.nv.gov  
alevin@ag.nv.gov  
*Attorneys for Defendants*  
Charles Daniels, Brian Williams,  
Tim R. Garrett, Kirk R. Widmar,  
Bobby K. Preston, Jason C. Chacon,  
and Tyler Randall

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

AJA GORSLINE,

Plaintiff,

vs.

CHARLES DANIELS, Director of the  
Nevada Department of Corrections (“NDC”)  
in his individual capacity; BRIAN  
WILLIAMS, Deputy Director of Operations;  
TIM R. GARRETT, Acting Warden and  
Associate Warden of the Lovelock  
Correctional Center (“LCC”); KIRK R.  
WIDMAR, Acting Associate Warden and  
Correctional Lieutenant of the LCC; BOBBY  
K. PRESTON, Correctional Lieutenant of  
the LCC; JASON C. CHACON, Shift  
Commander of the LCC; Tyler Randall,  
Correctional Officer previously identified as  
John Doe Corrections Officer; JOHN  
AND/OR JANE DOE CAPTAIN; JOHN  
AND/OR JANE DOE LIEUTENANT; JOHN  
AND/OR JANE DOE SERGEANT; JOHN  
AND/OR JANE DOES CORRECTIONS  
OFFICERS; JOHN AND JANE DOES 1 –  
40,

Defendants.

Case No. 3:21-cv-00019-ART-CLB

**STIPULATION TO EXTEND TIME  
TO RESPOND TO PLAINTIFF’S  
SECOND AMENDED COMPLAINT  
AND TO SET BRIEFING SCHEDULE  
(First Request)**

1 IT IS HEREBY STIPULATED between Plaintiff Aja Gorsline (“Plaintiff”) and  
2 defendants Charles Daniels, Brian Williams, Tim R. Garrett, Kirk R. Widmar, Bobby K.  
3 Preston, Jason C. Chacon, and Tyler Randall (collectively “Defendants”), by and through  
4 their undersigned counsel of record, and pursuant to LR IA 6-1, as follows:

- 5 1. This is the first stipulation and for extension of time to respond to Plaintiff’s  
6 second amended complaint (“SAC”).
- 7 2. Plaintiff filed her SAC on March 30, 2022.
- 8 3. The SAC adds a new defendant, Tyler Randall.
- 9 4. Plaintiff has not yet served Tyler Randall.
- 10 5. Tyler Randall’s response to the SAC is not yet due.
- 11 6. The last day for the remaining Defendants to respond to Plaintiff’s SAC is  
12 April 13, 2022.
- 13 7. On April 12, 2022, Defendants’ counsel was retained and authorized to accept  
14 service on behalf of Tyler Randall.
- 15 8. To avoid duplicate briefing on the SAC, the parties agree to the following  
16 briefing schedule that will apply to all Defendants:
  - 17 a. Last day for Defendants to file a motion to dismiss the SAC: Friday, May  
18 27, 2022

19  
20  
21 ...

22 ...

23 ...

b. Last day for Plaintiff to file her opposition: Friday, June 10, 2022

c. Last day for Defendants to file their reply: Friday, June 17, 2022

DATED this 13th day of April, 2022.

DATED this 13th day of April, 2022.

AARON D. FORD  
Attorney General

By: /s/ Akke Levin  
Steve Shevorski (Bar No. 8256)  
Chief Litigation Counsel  
Akke Levin (Bar No. 9102)  
Senior Deputy Attorney General  
*Attorneys for Defendants*

By: /s/ Nicole M. Harvey  
Nicole M. Harvey (Bar No. 11147)  
4894 Sparks Boulevard  
Sparks, Nevada 89436  
*Attorney for Plaintiff*

**ORDER**

IT IS SO ORDERED.

DATED this 14th day of April, 2022.

  
\_\_\_\_\_  
DISTRICT COURT JUDGE  
UNITED STATES MAGISTRATE JUDGE